

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KISON PATEL,)	Case No. 15-C-8174
individually and on behalf of)	
a class of similarly situated people,)	Judge John Z. Lee
)	
Plaintiff,)	
)	
)	
v.)	
)	
)	
AT&T SERVICES, INC. and ILLINOIS)	
BELL TELEPHONE COMPANY,)	
)	
Defendants.)	

**JOINT MOTION TO CONTINUE DEADLINE TO FILE A MOTION FOR
PRELIMINARY APPROVAL OF A CLASS-WIDE SETTLEMENT**

NOW COMES the Plaintiff Kison Patel (“Patel”) and the Defendants AT&T Services Inc. and Illinois Bell Telephone Company (collectively “AT&T”), and jointly move the Court to extend until July 22, 2016 the current July 20, 2016 deadline to file a motion for preliminary approval of a class-wide settlement. In support of this motion, the parties state as follows:

1. After engaging in discovery, Patel and AT&T entered into a preliminary agreement to settle this case on a class-wide basis, and documented that agreement in an initial term sheet. The parties have diligently pursued a final settlement agreement, including the drafting of a formal class-wide settlement agreement

2. The Court originally set a deadline of June 24, 2016, for the parties to file a motion for preliminary approval of the final settlement agreement. On June 20, 2016, the parties moved for an extension of this deadline to July 20, 2016. In a June 21, 2016 docket entry (Doc. No. 31), the Court granted that motion, and scheduled a hearing on the forthcoming motion for August 4, 2016.

3. The parties will not be able to finalize and sign the settlement agreement and associated papers by July 20, 2016, in part because of a client unavailability on the part of Defendants. As a result, the parties request an extension to July 22, 2016 for the submission of the motion for preliminary approval. The parties do not believe that this extension will affect the August 4 hearing date, and will notice the preliminary approval motion for that date.

4. This motion is made in the interest of justice and not of delay.

WHEREFORE, the parties respectfully request that this Court enter an ORDER continuing the deadline for the parties to file a motion for preliminary approval from July 20, 2016 until July 22, 2016.

RESPECTFULLY SUBMITTED this 19th day of July, 2016

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CERTIFICATE OF SERVICE

I hereby certify that on July 19, 2016, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will automatically send e-mail notification of such filing to all attorneys of record in this action.

/s/ Kyle J. Steinmetz

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